

## Certification of Organic Wild Collection Operations

### CERES Policy

1	<b>Aims</b>	Define the conditions under which wild collection operations can be certified as "organic", according to (EU) 2018/848, (EC) 834/07*, NOP, and JAS.
2	<b>Background</b>	<p>The above-mentioned regulations on organic farming include the possibility of certifying wild crafting activities of plants and mushrooms. Certification of these activities allows, on the one hand, the organic industry to purchase raw materials that would otherwise not be available from organic sources, and on the other hand gives producers in the source countries access to premium markets.</p> <p>Unfortunately, standards of the above-mentioned regulations regarding wild crafting are not very specific. The present policy intends to fill this gap.</p> <p>None of the organic standards covers collection or hunting of wild animals.</p>
3	<b>Normative framework</b>	<p><b>EU-Regulation*:</b></p> <p>Reg. (EU) 2018/848, Annex II, Part 1: <b>Plant production rules</b></p> <p><i>“ 2.2: Rules concerning the collection of wild plants</i></p> <p><i>The collection of wild plants and parts thereof growing naturally in natural areas, forests and agricultural areas is considered as organic production, provided that:</i></p> <p><i>(a) for a period of at least three years before the collection, those areas were not treated with products or substances other than those authorised pursuant to Articles 9 and 24 for use in organic production;</i></p> <p><i>(b) the collection does not affect the stability of the natural habitat or the maintenance of the species in the collection area.”</i></p> <p>Reg. 834/07, Art. 12: <b>Plant production rules:</b></p> <p><i>“(2) The collection of wild plants and parts thereof, growing naturally in natural areas, forests and agricultural areas is considered an organic production method provided that:</i></p> <p><i>(a) those areas have not, for a period of at least three years before the collection, received treatment with products other than those authorised for use in organic production. under Article 16;</i></p> <p><i>(b) the collection does not affect the stability of the natural habitat or the maintenance of the species in the collection area.”</i></p> <p><b>NOP:</b></p> <p>§ 205.207 Wild-crop harvesting practice standard.</p> <p>(a) Any area from which a wild crop that is intended to be sold, labelled, or represented as organic is harvested must have had no prohibited substance, as set forth in § 205.600, applied to it for a period of 3 years immediately preceding the harvest of the wild crop.</p> <p>(b) A wild-crop must be harvested in a manner that ensures that such harvesting or gathering will not be destructive to the environment and will sustain the growth and production of the wild crop.</p> <p>Furthermore, we refer to the NOSB Recommendation on Multisite certification from 2008, which allows for certification of operations based on an internal control system, even when the certifier does not visit each crop or wild crop field.</p> <p><b>JAS:</b></p> <p>Notification 59, Art. 2.2:</p>

		In collection fields (...for collecting the ... products growing spontaneously...), to collect the ... product by such methods as affecting no damage for preserving the ecosystem...
4	<b>Terms, clarifications</b>	<p>a. <b>Wild or natural:</b> Plants and mushrooms that grow spontaneously on agricultural land (segetal flora and fungus population) and are not taken care of (no weeding, transplanting, etc.) can be considered as "wild" or "natural" and thus wild crafted. In the following cases, (trans)planted plants can be considered as "wild":</p> <ul style="list-style-type: none"> <li>i. Forest trees or other trees planted on community land or along roadsides (for further conditions, please see 5.1.4 below), which were mainly planted for other purposes (e.g. timber, fuel wood, wind shelter), while the collected part is a by-product (e.g. <i>Betula</i> or <i>Tilia</i> or <i>Eucalyptus</i> leaves), <b>and</b> the trees are not planted on farmland belonging to the collectors.</li> <li>ii. Typical wild collection plants, which are re-planted inside their typical "natural" habitat, without further cultivation, to make collection more sustainable. This is being done by the most serious and responsible wild collection organisations, and CERES clearly supports such initiatives.</li> <li>iii. Abandoned fruit orchards, where not only the owner / leaseholder can go for harvesting, but also other local people.</li> </ul> <p>b. Examples of cases, which <b>cannot</b> be considered as "wild":</p> <ul style="list-style-type: none"> <li>i. Low input fruit orchards (German: "Streubost")</li> <li>ii. Bamboo, which is not only replanted, but also mechanically weeded</li> <li>iii. Walnuts harvested in farmer gardens.</li> <li>iv. Abandoned fruit orchards, where only the owner / leaseholder can go for harvesting</li> <li>v. When many individuals are assigned small pieces of land, on which they have the exclusive right to harvest, (thus creating incentives for increasing production by weeding, planting, fertilizing, or even applying pesticides), such structures should be handled as smallholder groups (see Policy 4.1.3), not as wild collection.</li> </ul> <p>c. We use the terms "wild collection", "wild harvest", "wild crop" and "wild crafting" synonymously.</p> <p>d. Wild collection <b>area:</b> The "area" is the entire region where wild collection takes place. This can be from a few square meters to hundreds of square kilometres.</p> <p>e. Wild collection <b>site:</b> The "site" is a relatively small place, which is visited by the inspector, a part of the wild collection area, which is normally not bigger than a few hectares.</p> <p>f. <b>Collector:</b> In our terminology, a "collector" is the individual person that harvests wild products, <b>not</b> the "buying centre". Synonymous to "picker" or "gatherer".</p> <p>g. <b>Buying centre:</b> A place where individual "collectors" deliver their products. Synonymous to "collection centre", "buyout location", "consolidator", "wholesale point", etc.</p> <p>h. <b>Main collector:</b> This is a term used by several wild collection operations. It refers to a person having a group of collectors under his/her responsibility. Often combined with a small buying centre.</p> <p>i. <b>Internal control system (ICS):</b> this term is normally used for groups of small <b>farmers</b>, not wild collectors. Especially in the context of the NOSB Recommendation for multi-site certification (see section 3), we also use it for the internal monitoring system of wild collection companies.</p> <p>j. <b>Prohibited substance:</b> this term is defined by NOP - "Prohibited substance. A substance the use of which in any aspect of organic production or handling is</p>

		<p>prohibited or not provided for in the Act or the regulations of this part.” The EU Regulation does not use this term, but we use it in an equivalent sense. We make the following distinctions between farming and wild collection in this regard:</p>												
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<b>5</b>	<b>Areas, which can or cannot be certified</b>													
<b>5.1</b>	<b>General</b>	<p>a. While farming operations have normally only limited possibilities for choosing their production sites, wild collection operations can normally choose where they work. Therefore, areas with significant pollution problems (see the definition of “Prohibited Substances” under 4(h) above) must be excluded from certification – regardless of the source of contamination.</p> <p>b. Wild collection operations must be able to provide a detailed description of the habitat, where each species typically grows. Many risks regarding sustainability and contamination are closely linked to the habitat. When a wild collection operation claims everything is collected in “forests” – while actually some of the species will never be found in a forest – this shows that things are not being taken seriously.</p>												
<b>5.2</b>	<b>Collection from farmland</b>	<p>a. For products from farmland, which can be considered as “wild” (see Section 4), it must be assured that no fertilisers or plant protection products, which are not allowed in organic farming, have been applied on the respective plots during the previous three years. This may be obvious for some production systems in remote areas where non-use of agrochemicals is generalised. On grassland with a high biodiversity, high population of legumes and low productivity, it is obvious that no nitrogen fertilisers or herbicides have been applied. Nevertheless, we must keep in mind that even in remote areas farmers often apply pesticides on certain crops (e.g. potatoes, vegetables, fruits).</p> <p>b. If separation between wild crafted products from organic (or zero input) and conventionally managed plots cannot be assured, the respective product cannot be certified. This is, e.g., often the case for typical weeds that may be collected from cropping areas (such as <i>Fumaria officinalis</i>, <i>Papaver rhoeas</i>, <i>Viola tricolor</i> or <i>Equisetum arvense</i> under European conditions) or from grassland (such as <i>Taraxacum officinalis</i>).</p>												
<b>5.3</b>	<b>Collection close to farmland</b>	<p>Certified organic wild products must not be harvested from field margins of conventionally managed crops where pesticides are used. This applies, e.g., for hedgerows along fields (<i>Rosa canina</i>, <i>Prunus spinosus</i>, <i>Sambucus niger</i>, etc.). As a rule, a distance of at least 20 meters between this kind of crops and collection places must be maintained. 50 meters must be considered in the case of fruit orchards where high-pressure sprayers are used. These distances can differ, depending on spraying intensity, main wind direction and equipment used.</p>												
<b>5.4</b>	<b>Forest areas</b>	<p>a. Collection can take place in forest areas where forest insecticides and herbicides have not been used during the previous three years.</p>												

		<p>b. In case that some woodland inside the collection area has received such applications, the operator must establish a plausible system to exclude collection from such places. Usually, this system consists in excluding from purchase all collection points within a 10 km distance from the treated area (in regions where collectors do not have cars) or 20 km (where some of the collectors do have cars). If collectors are paid higher prices for certified products, these distances must be considerably longer.</p> <p>c. To confirm non-use of forest pesticides, we normally rely on written declarations issued by competent forest authorities. In case of doubt, however, the inspector is requested to check original documents at the forest plant protection department or similar organisations.</p> <p>d. In areas, where forests are not “managed”, neither by government authorities nor by private entities, confirmations as explained in section (c) are not mandatory. In such cases, the inspector must verify other types of evidence to ensure non-use of prohibited substances.</p>												
5.5	Polluted areas	<p>a. Certified organic wild products must not be collected from regions with a high general level of environmental pollution, from industry, traffic, mining, or nuclear facilities. In most cases, this can be assessed by the inspector through the geographical location of the collection area, but may in some cases require additional research, e.g. on heavy metal residues, persistent organic pollutants (POPs, like e.g. DDT or PCB) or radiation levels of soils and/or plant or mushroom samples. Certain areas may be excluded from certification for such reasons.</p> <p>b. As a general rule, organic products must not be collected:</p> <ul style="list-style-type: none"> <li>o Inside urban areas.</li> <li>o Close to roads, per the following scheme:</li> </ul> <table border="1" data-bbox="544 1070 1442 1211"> <tr> <td>Vehicles per 5 minutes</td> <td>&lt; 3</td> <td>3 – 15</td> <td>16 – 50</td> <td>51 – 100</td> <td>&gt; 100</td> </tr> <tr> <td>Distance to be kept (m)</td> <td>5</td> <td>25</td> <td>50</td> <td>100</td> <td>200</td> </tr> </table> <p>Along dust roads: as far as dust is visible on plants.</p> <ul style="list-style-type: none"> <li>o In a 5-km circle around air polluting industrial centres and mines.</li> <li>o In a 50-km circle around nuclear facilities.</li> <li>o 20 m from railways.</li> <li>o 20 to 100 m from litter dumps, depending on the size of the dump.</li> </ul> <p>c. For areas, which have been affected by nuclear fallout, we have established the following rule: Wild harvested products may only be sold as organic, provided their accumulated radioactive level for Cs 134 plus Cs 137 remains below 370 Bq/kg, which is the maximum established by Regulation (EC) 616 / 2000 for baby food (as opposed to 600 Bq/kg for foodstuff in general). In case of operations, which sometimes or frequently reach levels close to this figure, the organic condition can only be approved lot wise. CERES may take samples for cross checking. This rule applies especially for those regions, which have been affected by the Chernobyl accident of 1986.</p>	Vehicles per 5 minutes	< 3	3 – 15	16 – 50	51 – 100	> 100	Distance to be kept (m)	5	25	50	100	200
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6	Sustainability, Nature Protection													
6.1	Sustainability	<p>a. All operators must establish "good collection rules" for the species they collect. Besides aspects of quality, these rules must include provisions for making collection sustainable. As a general guideline, rules must include, that <b>at each collection site</b>, not more than:</p> <ul style="list-style-type: none"> <li>o 60 % of flowers and leaves</li> <li>o 70 % of fruits</li> <li>o 5 % of roots or barks</li> </ul> <p>should be collected. The rules should also be very specific regarding e.g.:</p>												

		<ul style="list-style-type: none"> <li>o Not pulling out plants with roots (unless the root is the harvested part)</li> <li>o Not cutting large branches, just for making harvest of flowers or leaves or fruits easier</li> <li>o A general rule for mushrooms is that small ones (e.g. less than 2 cm diameter in the case of chanterelle and less than 3 cm in the case of <i>Boletus edulis</i>) and old ones must be left untouched. Old mushrooms are a source of spores and necessary for sexual reproduction.</li> <li>o Non-target species must be left untouched. etc.</li> <li>b. Especially when it comes to vulnerable or threatened species, such rules must be very detailed, while for some other species, general guidelines may be sufficient.</li> <li>c. For some plants considered as "ecological weeds", rules for sustainable collection are not required. This is especially the case for neophytes (exotic species), but also for some native species whose populations tend to increase due to human intervention (e.g. <i>Urtica dioica</i> in the European context).</li> <li>d. In some cases, in-depth research may be required for assessment of maximum harvest quantities. We must consider, e.g., that not only vegetative, but also sexual reproduction of plants and mushrooms is necessary, to assure the level of intraspecific biodiversity required for the species' survival. Assessment by local scientific institutes is very helpful in these cases but double-checking through international experts may be requested sometimes.</li> <li>e. Exact botanical identification is a MUST for sustainability. Behind a wrongly identified plant (which per the name may be very common), there may be a species, which in fact is threatened. Behind something called <i>Thymus serpyllum</i> or <i>Thymus</i> spp., there may be a complex of species, some of which may be endemic and vulnerable. CERES will normally not certify wild harvesting of species which are not clearly identified by competent persons – except for cases, where proof exists, that even a whole genus does not include any vulnerable or threatened species in the region.</li> <li>f. Plants or mushrooms mentioned in national or international red lists as endangered species for the respective region must not be collected at all – unless the wild harvesting organisations has established a convincing system for assuring sustainability (which will in many cases include replanting of the harvested species).</li> <li>g. In case that the operator is not able to provide sufficient proof for sustainability of the wild harvest, CERES can reduce the quantity of certified plants, or exclude the respective species from certification.</li> </ul>
6.2	<b>Damage to the environment</b>	<ul style="list-style-type: none"> <li>a. Collectors must not leave inorganic garbage in the collection areas.</li> <li>b. It is the certificate holder's responsibility to ensure that collectors do not contribute to forest fires and other kinds of environmental damage. It must be safeguarded that sensible animal species are not disturbed, especially during their breeding periods, e.g. through excessive and long-lasting noise. Collectors must not participate in illegal hunting.</li> <li>c. The certificate holder must assure that pickers, who are under his responsibility, do not harvest legally protected species – even if these are not being traded through the company requesting certification.</li> </ul>
7	<b>Training and Monitoring</b>	
7.1	<b>Training</b>	<ul style="list-style-type: none"> <li>a. Rules for good collection practices must be written in a way, which is easily understandable for collectors, and handed out to all of them.</li> <li>b. Collectors must receive theoretical and practical training. Just hanging up the rules in the collection centre, is not sufficient.</li> <li>c. The group of collectors must be clearly defined by a list of names. Collector training must be recorded, including date, contents, and participants.</li> <li>d. Training must reach all collectors involved in wild harvesting (see section 4(e) for a definition of "collector"). The certificate holder is responsible for <b>direct</b></li> </ul>

		<p>training of all collectors. If certain staff or outsourced persons are proven to be competent, training can be delegated. “Cascade training” (e.g. certificate holder trains “main collectors” (see 4(g) above), main collectors train their group of collectors, is not sufficient.</p>
7.2	<b>Internal Monitoring / Internal Control System (ICS)</b>	<p>a. Collectors often:</p> <ul style="list-style-type: none"> <li>o Do not benefit directly from certification</li> <li>o Have only a loose relationship with the company that buys the products</li> <li>o Have only a low level of awareness of rules of GCP.</li> </ul> <p>For this reason, we can usually not assume that they will voluntarily follow the established rules, and must have a stricter control, as compared to farming or processing units.</p> <p>b. Since external inspections in most cases take place only once a year, the certified operator must take care of permanent supervision of the collectors.</p> <ul style="list-style-type: none"> <li>o The easiest way to safeguard this is collection in groups, which are directly organised and accompanied by the responsible company.</li> <li>o Otherwise, one or several persons on behalf of the operator must visit regularly the collectors in the field, to supervise fulfilment of rules on GCP, and standards established in this policy. These visits must be documented in simple forms. Frequency of these visits will be established on a case-to-case basis, depending on the collected species, type of landscape, and level of collectors' training.</li> <li>o The internal control visits must cover, as a minimum, each collection area and each type of habitat inside the collection area. If e.g. several plant species are collected on the same alpine meadows, then one or two monitoring visits may be enough. But if one species is collected on meadows, a second species in forests, and a third species on farmland, then for each species a control visit must be conducted and recorded.</li> <li>o Such internal control visits must, of course, not only focus on conventional quality criteria, but mainly on implementation of the internal rules established by the wild collection company and approved by CERES.</li> </ul> <p>c. The internal monitoring / ICS must also regularly control the functioning of the buying system. Frequency of the internal control visits depends on the size, uniformity and complexity of the system. When there are many small buying centres using a uniform system, and which only buy e.g. forest berries during three weeks of the year – then one internal control visit to each buying centre may be enough. When the buying centres operate during several months, buying and storing different species at different times, then several control visits must be done. These internal control visits must be recorded, and they must cover issues relevant to organic wild collection, such as:</p> <ul style="list-style-type: none"> <li>o Are records kept for each purchase from each collector?</li> <li>o Are the quantities delivered by each collector plausible? Can one person collect X kg of this product in one day?</li> <li>o Are only trained persons allowed to deliver wild collected products?</li> <li>o Any suspicion of hidden entities (e.g. secondary or tertiary buying centres) being involved?</li> <li>o Does the condition of the delivered products confirm that rules for GCP are being followed (e.g. certain plants not pulled out with roots, only mushrooms of appropriate size are collected, etc.)</li> <li>o Are storage conditions appropriate and allow for full traceability?</li> </ul> <p>Etc.</p>
7.3	<b>External Control of Collection Sites</b>	<p>CERES has developed a special tool for calculating the number of collection sites and collection points (buying centres) to be visited by the inspector. The calculation is based on risk assessment, quality of the internal system, and uniformity of the different regions and buying centres.</p>

		If the internal monitoring system does not cover all collection areas and all buying centres, then these must be inspected externally by CERES.
<b>8</b>	<b>Food Safety</b>	<p>Control of food safety, including hygiene, is not the main target of organic certification; but organic certifiers are obliged to address obvious violations of food safety rules. This refers, among others, to poor hygienic conditions during collection, transport and storage. Examples of unacceptable practices:</p> <ol style="list-style-type: none"> <li>Drying or storage of products in direct contact with treated wood</li> <li>Drying or storage of products on bitumen surfaces</li> <li>Drying or storage of products together with fuel, lubricants, pesticides, etc.</li> <li>Transport or storage in bags previously used for fertilisers or the like.</li> <li>Use of insect repellents by pickers, especially on their hand, which are in contact with organic products. Residues of repellents on organic products may lead to de-certification of the respective lots, including the obligation to downgrade already sold products (Reg. EC 834/07, Art. 30).</li> </ol>
<b>9</b>	<b>Traceability and records</b>	<p>Wild collected products must be traceable back to their origin. This includes, as a minimum, the following requirements:</p> <ol style="list-style-type: none"> <li>Individual collectors can keep products in their homes during drying if appropriate hygienic conditions are given (Section 5.4). If collectors store products at their homes beyond the time, which is required for drying, they are subject to the same recordkeeping requirements as buying centres. In such cases, up-to-date records of their stock and its origin must be available at the central office of the wild collection company.</li> <li>If collectors buy wild collected products from others, they are to be considered "collection centres" and subject to the respective recordkeeping requirements. This also applies to "main collectors" (see 4(g) above).</li> <li>Fix or mobile buying centres must keep detailed records of quantities delivered by each individual collector. These records must include the species, date, name of the person, and quantity.</li> <li>At the buying centre and from there onwards, products must be packed and labelled during storage and transport. Bags must be labelled individually; a lot wise identification of bags is not sufficient if bags can be moved individually.</li> <li>Transport from buying centre to central warehouses, processing or export units, must be accompanied by delivery notes / waybills.</li> <li>Central warehouses, processing or export units are subject to the recordkeeping requirements for food processing companies, including reception procedures, processing records, storage books, bookkeeping, etc.</li> </ol> <p>For further details regarding records required from wild collection companies, refer to the "Standard Inspection Program Wild Collection".</p>
<b>10</b>	<b>Maps</b>	<p>Maps for the wild collection areas must be detailed enough. On paper-based maps, we expect scales not smaller than 1: 150,000, but prefer scales of 1: 50,000. On any kind of maps, paper based or digital, the following details must be clearly identified:</p> <ol style="list-style-type: none"> <li>Location of collection centres</li> <li>Limits of collection areas</li> <li>Habitats (see 5.1.1(b) above)</li> <li>Areas, where each species grows</li> <li>Potential sources of contamination (see 5.1.5 above)</li> </ol> <p>Here is a fictitious example for a good map:</p>

<p>11</p>	<p><b>Related documents</b></p>	<p>3.2.3 Brief Information on Wild Collection (Inf)            4.2.3.3 Wild Collection Inspection (WI)            4.3.3 Management Plan Wild Collection (F)            4.3.3.1 Wild Collection Species Spreadsheet (F)            4.4.3 Standard Inspection Program Wild Collection (Inf)            4.5.3 Wild Collection Site Evaluation by Inspectors (F)            4.5.3.1 Wild inspection preparation (T)</p>

\* **Note:** Due to a transitional period, products in third countries outside the European Union can still be certified as "equivalent to" Reg. (EC) 834/07 until end of 2024. For further details, please see the CERES Policy on Third Country Certification.